



## OPERATIONAL MEMO

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<b>TITLE:</b>	<b>UPDATED INFORMATION PERTAINING TO DAY PROGRAM AND TRANSPORTATION SERVICES</b>
<b>SUPERSEDES NUMBER:</b>	<b>HCPF OM 21-037</b>
<b>EFFECTIVE DATE:</b>	<b>JUNE 3, 2021</b>
<b>DIVISION AND OFFICE:</b>	<b>BENEFITS AND SERVICES MANAGEMENT DIVISION, OFFICE OF COMMUNITY LIVING</b>
<b>PROGRAM AREA:</b>	<b>HCBS WAIVER SERVICES</b>
<b>KEY WORDS:</b>	<b>COVID-19, CORONAVIRUS, BENEFITS AND SERVICES, HOME AND COMMUNITY-BASED SERVICES, DAY PROGRAMS AND SERVICES, NON-MEDICAL TRANSPORTATION</b>
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*HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>*

### **Purpose and Audience:**

The purpose of this Operational Memo is to update guidance to Home and Community-Based Services (HCBS) providers and Case Management Agencies (CMAs) on the provision of Day Program services and Non-Medical Transportation (NMT) in response to the COVID-19 pandemic. These provisions are applicable to the following services:

- Adult Day Services
- Day Habilitation
- Day Treatment (Brain Injury Waiver)
- Prevocational Services
- Supported Employment – Group
- Non-Medical Transportation

### **Information:**

The Department of Health Care Policy & Financing (Department) has updated guidance and requirements for Day Program and Non-Medical Transportation services based on

the most recent information provided by the Centers for Disease Control (CDC) in addition to the Colorado Department of Public Health and Environment.

As more and more individuals are vaccinated in Colorado, evidence is growing that those who are fully vaccinated can safely resume their normal activities without fear of contracting or spreading COVID-19. On May 13, 2021, the CDC outlined new mask guidance for vaccinated and unvaccinated individuals. In accordance with this guidance, we must continue to take measures to facilitate reopening the economy while protecting public health by incorporating best practices to protect individuals from infection. Described in detail below are updated guidelines providers must follow to ensure the health and safety of all participants and staff, along with continued requirements of all day program providers.

#### Updated Guidelines:

##### 1. Fully vaccinated staff and participants:

- A person is considered [fully vaccinated](#) for COVID-19 if more than 2 weeks has passed since the person received the second dose in a 2-dose series (Pfizer-BioNTech or Moderna) or if more than 2 weeks has passed since the person received the single-dose vaccine (Johnson & Johnson).
- Per [Executive Order 2021 103](#), any fully vaccinated individual may go without any type of face covering in Day Program settings. However, a provider agency may require all staff and participants to wear face coverings for the duration of day program, regardless of vaccination status. While masks are not required for vaccinated individuals, the Department still encourages masks and socially distancing when possible.
  - Each provider agency must develop policies and procedures outlining requirements for proof of vaccination or including whether they are operating on an honor system protocol.
- Fully vaccinated participants and staff may refrain from quarantine and testing following a known exposure if asymptomatic.

##### 2. Screening of participants and staff:

- Providers should actively screen all staff and participants in person, which includes temperature and COVID-19 symptom checks. Please see an [example](#) provided by the Colorado Department of Public Health &

Environment along with some additional information on [how to conduct a screening](#). Anyone with a positive screen shall be sent home and required to quarantine. The participant/staff may return after completion of a 10-day isolation period with at least three (3) days without symptoms. All non-vaccinated staff should be tested prior to providing in-person services, with confirmed negative testing.

3. Personal Protective Equipment:

- The Department recommends providers have policies and procedures in place for non-vaccinated participants that are unable to wear a face covering. If the participant is unable to wear a face covering, but can wear a face shield instead, that is highly encouraged.

4. Setting capacity and service delivery options:

- It is each provider's choice whether to reopen their day program, provide modified day program services, including telehealth day services, or remain closed. Providers offering site-based, group services must remain in compliance with all local county health department guidance and ordinances with regard to operation restrictions and capacity limits.

5. Non-Medical Transportation:

- Providers may resume rides at maximum vehicle capacity, including when transporting participants who are non-vaccinated. However, staff and participants who are not fully vaccinated must continue to wear a face covering and socially distance when possible for the duration of the ride. Those who are vaccinated are not required to wear a mask but are still encouraged to wear one and adhere to all recommended infection prevention and control measures, including source control, physical distancing, and hand hygiene.
- The [CDC recommends](#) improving the ventilation in the vehicle if possible — for example, by opening the windows or setting the air ventilation/air conditioning on non-recirculation mode.
- Providers can require face coverings to be worn by both staff and participants at all times, regardless of vaccination status.

Continued Requirements Providers Must Adhere To:

1. Infection control:

- Have in place infection control protocols that are compliant with current [CDPHE](#) and [CDC](#) guidelines. With new and updated guidance regularly being provided, be sure to update protocols, as needed.
- The setting employs enhanced cleaning and disinfecting protocols for the setting, including outlining frequency of cleaning high-touch surfaces and bathrooms while in operation. Additional guidance on how to properly disinfect, including how often, may be found on the Colorado Department of Public Health & Environment website [here](#).

2. Specific medical needs of participants and their individual risk level:

- Participants who are not ready to return to in-person, group Day Program services, can utilize Telehealth Day Program services, or speak to their case manager about receiving 1:1, individual Day Program services, as available. Information on flexible service delivery options for [Adult Day Services](#) and [Day Habilitation](#) services is provided within the links.
- If any participant or staff begins showing symptoms while at Day Program, the setting should cease any further activities, isolate the participant/staff, and sterilize the facility. Day Programs can resume in-person services the following day once sterilization and proper cleaning has been completed and following CDC and CDPHE guidance. The participant may resume in-person services after completion of a 10-day isolation period with at least three (3) days without symptoms. All non-vaccinated staff should be tested prior to providing in-person services, with confirmed negative testing.

3. Communication plan:

- The provider has written policies that outline provider and participant responsibilities as they relate to COVID-19, including but not limited to, policies on providing proof of vaccination status, face coverings, terminations, refusal to serve, how to interact while in the setting, expectations on notification by the participant or family in notifying the provider if anyone in their home is COVID-19 positive, etc. These policies clearly outline the providers' responsibility in denial of services to protect the safety of others, and the participants' responsibility to mitigate spread of COVID-19 to receive services.

**Additional References for this document & Resource Links:**

- [FAQS for Healthcare Providers Regarding Medicare Billing & Payment](#) (CMS)
- [Interim Health Care Infection Prevention & Control Recommendations for Patients Under Investigation for Coronavirus Disease 2019 \(COVID-19\)](#) (CDC)
- [Information Regarding COVID-19](#) AHCA/NCAL (American Health Care Association / National Center for Assisted Living)
- [Handwashing 101](#) (ServSafe)
- [Print-Only Materials to Support COVID-19 Recommendations](#)

Follow the [CDC website](#) to keep up with the general trends and what's happening. Communicating with your [state health department](#) and watching local news will help you with specifics.

**Attachment(s):**

None

**Department Contact:**

[HCPF\\_HCBS\\_Questions@state.co.us](mailto:HCPF_HCBS_Questions@state.co.us)

**Department COVID-19 Webpage:**

<https://www.colorado.gov/pacific/hcpf/COVID>

For specific information, please call the CDPHE Call Center at 303-692-2700. For general questions about COVID-19: Call CO-Help at 303-389-1687 or 1-877-462-2911 or email COHELP@RMPDC.org, for answers in English and Spanish (Español), Mandarin (普通话), and more.